

Comments on FCC Localism Proceeding

April 23, 2008

BACKGROUND

My name is Kristi Kay Garrity and I have been working in radio since 1988. Over the years I have been an advertising sales representative, station sales manager and General Manager of Virginia Broadcasting Company and Midwest Radio Network. I'm now with Midwest Communications. I have never left my original station which was K100-WCDK (now Radio USA-WUSZ). However due to two different takeovers that combined three different groups, my current position is with Midwest Communications as a GSM.

GENERAL COMMENTS

There are now many radio stations that broadcast news and public affairs 24 hours a day, seven days a week. Almost all rated markets have this service from one or more radio station. There are stations broadcasting religious programming 24/7 as well as 24 /7 sports stations, almost every type of music is available across the radio dial. There are also program genres of limited appeal that are not on the radio dial. Fans of those genres have CDs and I pods that they can listen to their choice of music. Many issues have been raised regarding broadcast localism in the current FCC proceeding. Proposals are being investigated with new rules in mind to assure broadcasting localism is alive and well. The public has never had so many choices from which to choose for local, regional and national public affairs plus news programming. Below are my opinions.

REMOTE STATION OPERATIONS

The main studio rules were changed in 1987 a year before I started in radio and then again in 1998. This was done to allow flexibility in location of broadcast main studios. These changes allow the main studio to be located generally within a radius of 25 miles of the community of license. Although most main studios are located much closer than 25 miles anything within 35 miles is believed to be local.

Demanding all radio stations be manned during all hours of operation would not be cost effective and would put at the very least small markets into huge financial trouble. Having someone

manning the stations 24 hours a day would not benefit our public in anyway. In this area you would not get qualified employees to work the off hours without paying them competitive high off peak hour wages. Workers willing to work off peak hours can easily find work in very good paying jobs. The mining industry and the paper mills are just a couple examples in this area willing to pay huge salary's to those willing to work off peak hours.

Automated operations do not hinder our stations ability to provide emergency information in any way. EAS participation is mandatory for all broadcast stations; emergency access is available universally 24 hours a day. As to access for other than emergency reasons current regulations require a physical presence during normal business hours and those are the hours that almost all American business is transacted. With today's technology I don't believe it is really necessary to maintain a 24 physical presence at our main studios.

MAIN STUDIO LOCATION

We have our main studio centrally located in the biggest city in the area which is Hibbing. It is centrally located in the most populated city and is located right between two other large cities and within just miles of many smaller cities. We are more accessible to more of the population having our main studio in the central location of all six stations. If we had to put a main studio in each of the area's we are licensed to it would decrease, not increase our accessibility to the many communities we serve. We have local phone numbers so we are accessible to all areas. We have live talk shows and invite guests from all cities around the area. Spreading our talent pool to different locations would hinder the availability to carry many of our local shows. If we relocated our main studios this would absolutely hinder most local programming.

VOICE TRACKING/NATIONAL PLAYLISTS

We are very limited in our talent pool for on air personalities. Voice tracking some shifts makes it easier to share real talent between our stations and within our company. Voice tracking some shifts makes us more cost effective and our sound is more professional, giving our listeners a top quality listening appeal. When we voice track our Program directors give out all local

information, IE: News, sports etc.....to each voice tracking air talent. It is updated many times daily, giving us a very local presence. If voice tracking is done correctly listeners have no knowledge that the talent is not live at the time.

If you look at all six of our stations as a whole for the most part the way we interact with our local audience is by phone, websites and fax, except for our local talk shows. On our local talk shows we carry guests from all cities we serve and they are invited into the studios for interaction. We have local phone numbers from each city as well as 800 numbers available for the entire area we serve. Unlike newspaper we try to reach the entire area we serve rather than just the city of license.

It's my belief that the FCC should not get involved in programming of music. We have six stations with different formats. There is a place for local artists and it is public radio. Some stations have no music at all rather they are all talk. The programming decisions of radio would and should be left up to the local stations. Listeners tune into the stations of their preference. If they don't like the format, they have the option to change the channel, listen to I-pods and CD's. If they want to hear local talent they can again tune into their local public radio station.